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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

12 In re
13 META MATERIALS INC.,
14 Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**TRUSTEE CHRISTINA LOVATO’S
DECLARATION IN SUPPORT OF HER
RESPONSE TO DANIELLE SPEARS’
EMERGENCY MOTION TO
INTERVENE, TO STAY PROCEEDINGS,
TO DISQUALIFY CONFLICTED
COUNSEL AND TRUSTEE, AND TO
RESET BANKRUPTCY
ADMINISTRATION UNDER NEUTRAL
AUTHORITY; MOTION TO COMPEL
DISCLOSURE, VACATE UNLAWFUL
PROTECTIVE ORDERS, AND REFER
FOR SANCTIONS AND SPECIAL
MASTER [ECF NO. 1988]**

Hearing Date: September 4, 2025
Hearing Time: 10:00 a.m.

25 Christina Lovato, under penalty of perjury of the laws of the United States, declares:

- 26 1. I am the duly appointed and acting trustee for the chapter 7 estate of Meta Materials,
27 Inc. (“Meta”). I have personal knowledge of the matters stated herein.
28 2. The Meta chapter 7 case was filed on August 9, 2024.

1 3. Following my appointment, I reviewed the petition and the schedules of assets and
2 liabilities and the statement of financial affairs. I concluded that I would need legal representation
3 to assist in my administration of the estate and employed Jeffrey Hartman of Hartman & Hartman
4 for that purpose. Mr. Hartman has represented me as my general counsel in other complex cases
5 including In re Double Jump, Inc., case no.19-50102 and related cases. That series of cases
6 involved a \$2 billion Ponzi scheme. Utilizing special litigation counsel, as Trustee I filed more
7 than 50 adversary proceedings and have collected more than \$100,000,000 for the consolidated
8 estates. In that same matter, I have settled many claims without litigation, approved by the Court
9 pursuant to F.R.Bankr.P. 9019 motions.

10 4. After my appointment in the Meta case, my counsel and I had discussions with
11 former officers and directors regarding prepetition events.

12 5. Preliminary analysis of the information gathered lead me to conclude that the Meta
13 estate has potential claims against a variety of individuals and/or entities related to the purchase
14 and sale of the company's publicly traded stock, prior to the halt by NASDAQ of further trading.

15 6. As a result, I interviewed attorney James W. Christian of Christian Attar regarding
16 possible representation of the Meta estate. I was aware that Christian Attar had previously
17 represented Meta regarding an initial investigation into market manipulation of its securities.

18 7. I filed applications to employ Christian Attar, Kasowitz, Benson & Torres, and a
19 third firm, Schneider Wallace, Cottrell & Konecky. The three firms are representing the Meta
20 estate on a contingent fee basis. In addition, the litigation funding firm of Parabellum Capital is
21 funding an amount in excess of \$11 million for funding the litigation.

22 8. The scope of the potential litigation involves market manipulation, spoofing and
23 'naked short' selling all of which require highly specialized litigation expertise.

24 9. At this point in time, the litigation team is pursuing discovery utilizing F.R.Bankr.
25 P. 2004 and 9016 to determine whether viable claims exist against a variety of entities in the
26 publicly traded securities arena.

1 10. In late June 2025, the United State Trustee received a letter from Danielle Spears
2 complaining about my administration of the Meta case (“Spears Complaint”). A copy of the letter
3 is attached hereto as **Exhibit 1**.

4 11. At the request of Jared Day, Trial Attorney for the UST, I prepared a response to
5 the Spears Complaint.

6 12. On July 23, 2025, attorney Cameron Gulden, Assistant United States Trustee,
7 responded to Ms. Spears. A copy of Mr. Gulden’s response is attached hereto as **Exhibit 2**.

8 DATED: August 21, 2025.

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11 /s/ Christina W. Lovato
12 Christina W. Lovato, Trustee
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